

New Factual Allegations	Supporting Evidence <sup>1</sup>
<p><b><u>Sparks &amp; Jenkins’ Bank Records:</u></b></p> <ul style="list-style-type: none"> <li>• Sparks and Jenkins made deposits for amounts above known income/sources in multiple bank &amp; loan accounts. (TAC ¶¶ 65, 106-112)</li> <li>• Jenkins’ money laundering scheme (TAC ¶ 106)</li> <li>• Payment to Jenkins from Female 4. (TAC ¶ 108)</li> <li>• Cash payments to Jenkins. (TAC ¶ 110)</li> <li>• Sparks’ use of multiple bank and loan accounts. (TAC ¶ 111-112)</li> </ul>	<ul style="list-style-type: none"> <li>• Eastman Credit Union (EASTMAN0001-001412) <b>(8/6/24)</b></li> <li>• Appalachian Community Credit Union (no Bates) <b>(7/30/24)</b></li> <li>• First Bank and Trust (SPARKS000150-701; SPARKS0001261-1273) <b>(10/4/24)</b></li> <li>• SunTrust Bank /Truist Bank (SPARKS000702-1260) <b>(10/4/24)</b></li> </ul>
<p><b><u>Sparks &amp; Jenkins’ Intentional Obstruction of Crime Scene, 9/19/2020, Peters’ Leadership Role:</u></b></p> <ul style="list-style-type: none"> <li>• Patrol officer deferring Sparks’ and Jenkins’ decisions. (TAC ¶ 67)</li> <li>• Decisions counter to JCPD search and seizure protocol. (TAC ¶ 67)</li> <li>• Did not test Williams’ bloody hands. (TAC ¶ 68)</li> <li>• Left Arlo video cameras pointing towards room unsecured. (TAC ¶ 69)</li> <li>• Allowed Williams to continue manipulating his cellphone. (TAC ¶ 70)</li> <li>• Failure to seize “Call Arlo!!!” note. (TAC ¶ 71)</li> <li>• Sparks and Jenkins intentionally left Diaz-Vargas in unsecured apartment. (TAC ¶ 72)</li> <li>• Hilton phone calls to Peters. (TAC ¶ 75)</li> <li>• Arlo cameras under paper towels. (TAC ¶ 77)</li> </ul>	<ul style="list-style-type: none"> <li>• Videos of JCPD officers at Williams’ apartment on 9/19/2020 (CITY-77500 - 77512) <b>(4/2/24)</b></li> <li>• Photographs of Williams’ bloody hands on 9/19/2020 (CITY-76859-76860) <b>(4/2/24)</b></li> <li>• Photographs of unsecured Arlo cameras (CITY-76852, CITY-76853, CITY-76855, CITY-76856) <b>(4/2/24)</b></li> <li>• Photograph of Williams’ retaining his cellphone (CITY-0076854, CITY-0076847) <b>(4/2/24)</b></li> <li>• Photograph of “Call Arlo!!!” (CITY-76858, CITY-76848) <b>(4/2/24)</b></li> <li>• JCPD Case File re Mikayla Evans’ Attempted Homicide (CITY-0076699 - CITY-0076773) <b>(4/2/24)</b></li> <li>• JCPD Search and Seizure protocol (CITY0000152-CITY0000167 re seizure of property; CITY0000177 re seizure of computer) <b>(4/2/24)</b></li> <li>• Hilton Call Logs (CITY-VERIZON-000021-23) <b>(7/30/24)</b></li> <li>• Photograph of hidden Arlo cameras. (CITY-77000) <b>(4/2/24)</b></li> </ul>
<p><b><u>Sparks &amp; Jenkins’ Intentional Obstruction in Executing Search Warrant, 9/19/2020; Peters’ Leadership Role:</u></b></p> <ul style="list-style-type: none"> <li>• Timing of executing search warrant; JCPD officers present and time of arrival/departure. (TAC ¶ 79)</li> <li>• Fail to secure, inventory, seize rifle. (TAC ¶ 80)</li> <li>• Fail to seize, inventory “Raped” list. (TAC ¶ 81)</li> <li>• Peters receiving regular updates from Hilton</li> </ul>	<ul style="list-style-type: none"> <li>• JCPD Case File re Mikayla Evans’ Attempted Homicide (including dispatch log and property receipts) (CITY-0076699 - CITY-0076773) <b>(4/2/24)</b></li> <li>• Photograph of rifle in Williams’ foyer. (CITY-76878) <b>(4/2/24)</b></li> <li>• Photograph of “Raped” list. (CITY-77011) <b>(4/2/24)</b></li> <li>• Hilton Call Logs (CITY-VERIZON-000021-</li> </ul>

<sup>1</sup> The dates in bold indicate when Plaintiffs obtained the cited evidence.

<p>during search. (TAC ¶ 82)</p> <ul style="list-style-type: none"> <li>List of seized digital devices. (TAC ¶ 86)</li> </ul>	<p>23) (7/30/24)</p>
<p><b><u>Sparks and Jenkins Fail to Obtain Search Warrant for Digital Devices; Turner and Peters' Leadership Roles:</u></b></p> <ul style="list-style-type: none"> <li>Sept. 19, 2020, Email from Hilton to JCPD leadership re need to obtain search warrant. (TAC ¶¶ 103-104)</li> <li>Turner discouraged Dahl from obtaining warrant. (TAC ¶¶ 105, 206, 208)</li> <li>Peters received updates about search warrants re Williams. (TAC ¶ 105)</li> <li>Evidence found in safe included baby doll with hole in the genitals, which was not inventoried. (TAC ¶ 100)</li> <li>In exchange for <u>not</u> obtaining search warrant, Sparks and Jenkins took hundreds of thousands in cash and a gold necklace. (TAC ¶ 101)</li> <li>12/08/2020: Peters directed Dahl to work with Sparks to obtain warrant. (TAC ¶ 214)</li> <li>Sparks intentionally delayed obtaining search warrant. (TAC ¶ 215)</li> <li>5/11/2021: Sparks attempted to return digital devices. (TAC ¶ 223)</li> </ul>	<ul style="list-style-type: none"> <li>Hilton Email (CITY-142112) (7/5/24)</li> <li>Dahl Recordings (<i>Dahl v. Turner, et al.</i>, Case 2:22-cv-00072-KAC-JEM; ECF 66-10) (<b>Dahl recordings publicly filed on 1/16/24</b>)</li> <li>Sparks 12/03/20 Memo to Peters. (CITY-0075832) (3/28/24)</li> <li>Sparks forwards emails with Dahl re Williams' search warrant to Peters. (CITY-0075818) (4/2/24)</li> <li>Photographs of baby doll and dildos (CITY-77964, 77965) (4/2/24)</li> <li>Photographs of cash from safe (CITY-77962, CITY-77966) (4/2/24)</li> <li>Video of opening of safe which shows gold necklace (CITY-0077998) (4/2/24)</li> <li>Property receipts from Evans' case (see above) (4/2/24)</li> <li>Finney deposition transcript (<b>Finney deposition held on 7/17/24</b>)</li> <li>5/11/2021: Sparks email to Dahl (CITY-75789) (3/28/24)</li> </ul>
<p><b><u>Obstruction of B.P.'s Case:</u></b></p> <ul style="list-style-type: none"> <li>Officer Matthew Gryder's role. (TAC ¶ 120)</li> <li>B.P.'s statement to Officer Proffit. (TAC ¶ 124)</li> <li>Turner transferred Bret Richardson. (TAC ¶ 130)</li> <li>Richardson's role on prior rape investigation. (TAC ¶ 130)</li> <li>Closure of B.P.'s case prematurely by Gryder. (TAC ¶ 131)</li> <li>JCPD sat on B.P.'s rape kit results. (TAC ¶ 184)</li> <li>Sparks asks B.P. to come to HQ to repeat her account of sexual assault. (TAC ¶ 190)</li> <li>Sparks' June 1, 2023, search warrant was an attempt to cover-up obstruction. (TAC ¶ 191)</li> </ul>	<ul style="list-style-type: none"> <li>JCPD case file for B.P.'s rape investigation. (CITY-0076107 - CITY-0076183)</li> <li>B.P.'s rape kit results (CITY-0076255 - CITY-0076259) (4/2/24)</li> <li>Audit trails for B.P.'s case (CITY-138194) (4/4/24)</li> <li>Letter from Richardson personnel file. (CITY-0142446) (7/5/24)</li> <li>Case file for W18008735 (CITY-0064014 - CITY-0064062) (3/19/24)</li> <li>Richardson deposition testimony. (<b>Richardson deposition held on 8/7/24</b>)</li> </ul>
<p><b><u>Obstruction of Female 2's Case:</u></b></p> <ul style="list-style-type: none"> <li>Failure to investigate Female 2's case; premature closure. (TAC ¶¶ 133-135, 139)</li> <li>Daigle testimony re Female 2's case. (TAC ¶ 136)</li> <li>Repeated JCPD phone calls to Female 2, including Peters' call. (TAC ¶ 137)</li> </ul>	<ul style="list-style-type: none"> <li>Female 2's JCPD case notes. (CITY-0064244)</li> <li>Telephonic interview with Female 2 (<b>Interview on 3/28/24</b>)</li> <li>Daigle deposition testimony (<b>Daigle vol. 2 deposition held on August 20, 2024</b>)</li> <li>Dunn deposition testimony (<b>Dunn deposition held on 7/18/24</b>)</li> </ul>

<ul style="list-style-type: none"> <li>Dunn's requests transfer from CID. (TAC ¶ 140)</li> </ul>	<ul style="list-style-type: none"> <li>Audit trails for Female 2's case (CITY-138195) (4/4/24)</li> </ul>
<p><b><u>Obstruction of Female 12's Case:</u></b></p> <ul style="list-style-type: none"> <li>TFO Adams alerted Gryder who called Sparks to intervene at FBI. (TAC ¶ 168)</li> <li>No legitimate reason to call Sparks. (TAC ¶ 169)</li> <li>Details of Female 12's effort to report Williams. (TAC ¶ 170-171)</li> </ul>	<ul style="list-style-type: none"> <li>Female 12's JCPD case notes. (CITY-0076364 - CITY-0076366)</li> <li>Gryder deposition transcript (<b>Gryder deposition held on 8/7/24</b>)</li> </ul>
<p><b><u>Legault's Knowledge of Dahl's Efforts to Investigate TBI Human Trafficking Case /Obstruction:</u></b></p> <ul style="list-style-type: none"> <li>Legault was aware of Dahl's efforts to investigate Williams' rapes with TBI. (TAC ¶ 176)</li> <li>Legault's role in pretextual termination of Dahl. (TAC ¶ 232-233)</li> </ul>	<ul style="list-style-type: none"> <li>Dahl recordings (see above)</li> <li>Email chain re Peters' canceling TBI meeting (CITY-0076015 - CITY-0076016) (3/28/24)</li> <li>Legault's 12/11/2020 email to Peters with Dahl case list (Publicly filed on 2/6/2024, <i>Dahl v. Turner, et al.</i>, Case 2:22-cv-00072-KAC-JEM)</li> </ul>
<p><b><u>Williams' Seized Digital Devices Contained Child Sex Abuse Material &amp; Videos/Images of Sexual Assault:</u></b></p> <ul style="list-style-type: none"> <li>Sparks and Jenkins knew or should have known and were in reckless disregard of this evidence. (TAC ¶ 178)</li> </ul>	<ul style="list-style-type: none"> <li>Finney deposition transcript (<b>Finney deposition held on 7/17/24</b>)</li> </ul>
<p><b><u>Turner and Peters' Knowledge of Dahl's Efforts to Investigate Sex/Human Trafficking Case:</u></b></p> <ul style="list-style-type: none"> <li>Summary of Turner and Peters' knowledge. (TAC ¶ 178)</li> <li>12/8/2020: Dahl explained to Turner Williams' connection to TBI human trafficking investigation. (TAC ¶ 201)</li> <li>Dahl connected victim on "Raped" list to victim in TBI investigation from Western Carolina University. (TAC ¶ 201)</li> <li>Turner and Peters attended meeting with TBI in December 2020 regarding Williams' rapes. (TAC ¶ 202)</li> <li>Peters canceled Dahl's meeting with TBI re human trafficking case / Williams' rapes. (TAC ¶ 203)</li> <li>12/8/2020: Turner told Peters that Dahl was briefing him on TBI investigation. (TAC ¶ 204)</li> <li>12/8/2020: Peters discussed conduct amounting to commercial sex trafficking (TAC ¶ 205)</li> <li>Peters received updates from Sparks on Williams' search warrants and Williams' digital devices. (TAC ¶ 210)</li> <li>Turner and Peters dismissed multiple victims' accounts as unbelievable. (TAC ¶ 213)</li> </ul>	<ul style="list-style-type: none"> <li>Dahl recordings (see above)</li> <li>Finney deposition transcript (see above)</li> <li>Peters' email canceling TBI meeting. (CITY-0076015 - CITY-0076016) (3/28/24)</li> <li>Sparks 12/3/2020 memo to Peters (CITY-0075832) (3/28/24)</li> <li>Sparks forwarded to Peters emails with Dahl and draft search warrant (CITY-0075818) (3/28/24)</li> <li>12/07/2020: Hilton – Peters texts re Williams' digital devices (CITY-0076018) (3/28/24)</li> <li>5/5/2021: Sparks email to Turner (CITY-0075810) (3/28/24)</li> </ul>

<ul style="list-style-type: none"> <li>5/5/2021: Sparks emailed Turner excuse for not obtaining warrant nine hours before botched arrest of Williams. (TAC ¶¶ 211-15.)</li> </ul>	
<p><b><u>Sparks Bribes Female 4:</u></b></p> <ul style="list-style-type: none"> <li>Status of join state-federal public corruption investigation. (TAC ¶ 240)</li> <li>TBI agent Gerald Ray interviews Female 4 (TAC ¶ 241)</li> <li>Sparks interviewed in public corruption investigation. (TAC ¶ 253)</li> <li>Records and deposits and checks from Sparks' Truist savings and checking accounts. (TAC ¶¶ 256-59, 261, 264-265)</li> <li>Phone calls to Female 4. (TAC ¶¶ 257, 260)</li> </ul>	<ul style="list-style-type: none"> <li>Finney Deposition testimony (see above) <b>(Finney deposition held on 7/17/24)</b></li> <li>Female 4 deposition testimony <b>(Female 4 deposition held on 6/4/24)</b></li> <li>Defendant City's Response to Plaintiffs' Second Set of Interrogatories (Served 6/19/2024)</li> <li>SunTrust Bank / Truist Bank (SPARKS000702-1260) <b>(10/4/24)</b></li> <li>Luxury Label records <b>(7/8/24)</b></li> <li>Female 4's cellphone records. <b>(4/4/24)</b></li> </ul>
<p><b><u>Cathy Ball Attempts to Purchase Williams' Penthouse Apartment:</u></b></p> <ul style="list-style-type: none"> <li>Ball – S.C. and S.C.-Williams text messages regarding Ball's purchase of Williams' apartment. (TAC ¶¶ 268-270, 273-275, 278-289)</li> <li>Ball – Turner texts re Ball's purchase of Williams' apartment. (TAC ¶ 272)</li> <li>Turner's knowledge that this was Williams' apartment. (TAC ¶ 271-272)</li> </ul>	<ul style="list-style-type: none"> <li>Ball deposition testimony <b>(Ball deposition held on 6/3/24)</b></li> <li>S.C. deposition testimony <b>(S.C. deposition held on 8/9/24)</b></li> <li>Ball/ Williams contract (S.C.0161-S.C.0183) <b>(7/24/24)</b></li> <li>Turner/Ball text messages (Turner000017-19) <b>(6/28/24)</b></li> <li>9/19/2020 Hilton email (See above)</li> </ul>